

[Submitting Counsel on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION**

No. 3:23-md-03084-CRB

**STIPULATION REGARDING
[PROPOSED] PRETRIAL ORDER NO. __:
DEPOSITION PROTOCOL**

This Document Relates to:

ALL ACTIONS

WHEREAS, on March 29, 2024, the Court entered an Order ruling in part on the parties’ disputes regarding a deposition protocol for this multi-district litigation. ECF No. 371.

WHEREAS, on August 1, 2024, the Court entered an Order ruling on the parties’ remaining disputes regarding a deposition protocol for this multi-district litigation. ECF No. 771.

WHEREAS, the Court’s August 1 Order required the parties “to incorporate the Court’s rulings from Dkt. No. 371 and from this Order into a final Stipulated and [Proposed] Deposition Protocol, to be submitted to the Court by August 8, 2024.” *Id.* at 14.

WHEREAS, the parties have complied with the Court’s order by drafting and submitting the Stipulated and [Proposed] Deposition Protocol, attached hereto as **Exhibit A**.

THEREFORE, the parties respectfully request that the Court enter the parties’ Stipulated and [Proposed] Deposition Protocol.

1 **IT IS SO STIPULATED.**

2 Dated: August 8, 2024

Respectfully submitted,

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24 Dated: August 8, 2024

25 By: /s/ Randall S. Luskey

26 *Attorneys for Defendants*
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